

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

CRAIG CUNNINGHAM, on behalf of himself and
all others similarly situated,

Plaintiff,

-vs.-

SHORE FUNDING SOLUTIONS INC.,

Defendant.

17 CV 02080 (ADS) (AKT)

**LOCAL RULE 37.3(a) MEET
AND CONFER
STATEMENT**

I, Aytan Y. Bellin, the undersigned counsel for Plaintiff Craig Cunningham (“Plaintiff”) hereby certify that on December 21, 2017, I conferred with counsel for Defendant Shore Funding Solutions, Inc. (“Shore Funding”) under Local Rule 37.3(a) in an effort to avoid filing Plaintiff’s Second Letter Motion to Compel Discovery Responses from Shore Funding, and although the parties agreed to a resolution of that motion, Shore Funding never served Plaintiff with the amended discovery responses ordered by this Court and agreed to by the parties. Indeed, as detailed in the accompanying Declaration of Aytan Y. Bellin in Support of Plaintiff’s Second Motion to Compel and for Sanctions at 2, ¶¶ 6-12, Shore Funding’s counsel has refused to even respond to any additional communications Plaintiff has attempted to have with him on the issues covered by this motion. Accordingly, it is apparent that the issues on this motion are not resolved despite Plaintiff’s good-faith efforts to do so.

Dated: January 11, 2018

Respectfully submitted,

BELLIN & ASSOCIATES LLC

By: /s/Aytan Y. Bellin
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*Attorney for Plaintiff and the
Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/Aytan Y. Bellin_____

Aytan Y. Bellin
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